

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

<b>IN RE: BENICAR (OLMESARTAN) PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2606</b>  Master Case No. 15-2606 (RBK/JS)  Hon. Robert B. Kugler, U.S.D.J.  Hon. Joel Schneider, U.S.M.J.
THIS DOCUMENT RELATES TO ALL CASES	<b>NOTICE OF MOTION TO EXCLUDE THE TESTIMONY OF PLAINTIFFS' EXPERT STEPHEN LAGANA, M.D.</b>

**PLEASE TAKE NOTICE** that on May 15, 2017 at 9:30 a.m., or as soon thereafter as counsel may be heard, Drinker Biddle & Reath, LLP, counsel for defendants Daiichi Sankyo, Inc., Daiichi Sankyo US Holdings, Inc., Daiichi Sankyo Co., Ltd., Forest Laboratories, Inc., now known as Forest Laboratories, LLC, Forest Pharmaceuticals, Inc., and Forest Research Institute, Inc. (collectively, "Defendants"), will move before the Honorable Robert B. Kugler, U.S.D.J., in the United States District Court for the District of New Jersey, for an order to exclude the testimony of plaintiffs' expert Stephen Lagana, M.D. In support of this application, Defendants will rely on the attached Brief in Support of the Motion to Exclude, and Certification of Daniel B. Carroll, Esq. and attached exhibits, submitted herewith.

Dated: March 31, 2017

Respectfully submitted,

/s/ Susan M. Sharko

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